

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAI'I; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

C.A. No. 1:25-cv-01363-DLB

DECLARATION OF IA MOUA

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Pursuant to 28 U.S.C. § 1746, I, Ia Moua, hereby declare as follows:

1. I am a resident of the State of California. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Governor's Office of Service and Community Engagement (GO-Serve) as the California Volunteers Director of State and National Service.

3. GO-Serve is responsible for elevating paid service and volunteerism in the state, promoting more youth and community engagement, and advancing public awareness and outreach campaigns to tackle the State of California's most pressing challenges, including responses to natural disasters.

4. GO-Serve operates California Volunteers, which is the California State Service Commission under the National and Community Service Act. California Volunteers is the largest state service commission in the country, and has engaged local communities through innovative and impactful grantmaking and program development at both the state and local levels for nearly 30 years.

I. AmeriCorps Support for Volunteer Programs in California

5. AmeriCorps provides vital support for volunteer-based service programs across California. First, California Volunteers has three large service programs that, until recently, were financially and programmatically supported by AmeriCorps State and National grants: AmeriCorps California, College Corps, and California Climate Corps. In addition, AmeriCorps provides direct funding to support California Volunteers' operations. Finally, AmeriCorps

supports (or supported) thousands of volunteers performing national and community service in the state, at programs outside of California Volunteers.

(a) AmeriCorps State and National Funding

6. The bulk of federal funding for service programs in California is through AmeriCorps State and National (ASN). Programs are selected first by California Volunteers based on merit according to its priority areas. AmeriCorps then selects some of those for funding based on a second competitive process, while others chosen by California Volunteers alone receive funding under population-based formula grants. California Volunteers acts as a pass-through for AmeriCorps funding.

7. Each fall, California Volunteers issues a Request for Applications (RFA) which asks potential host organizations to submit sub-applications, within AmeriCorps guidelines, that address California's priority areas. For example, to be eligible for funding for the current service year, applicants were required to propose a service program that will place AmeriCorps members in communities to address unmet needs in one or more of the following focus areas set by California Volunteers:

- a. Climate Action: Supporting and educating communities to become more resilient through measures that reduce greenhouse gas emissions, prevent and mitigate wildfires, conserve land and water, reduce resource use, and/or increase renewable energy use.
- b. Environmental Stewardship: Improving at-risk ecosystems, improving use and protection of natural environment, and/or increasing sustainable practices and education to build resilience in natural ecosystems and communities.

- c. Education: Improving educational outcomes for economically disadvantaged children, including improved school readiness; improved educational and behavioral outcomes of students in low-achieving elementary, middle, and high schools; and/or increasing readiness and access for post-secondary education and career opportunities.
- d. Food Security: Increasing food security and stability for our most vulnerable communities
- e. Disaster Services: Helping individuals and communities prepare for, respond to, recover from, and mitigate the effects of disasters and increasing community resiliency.
- f. Resource Access: Providing access to vital resources, services, and benefits critical to moving our most vulnerable communities from crisis to stability through peer support, resource navigation, and case management.

8. In addition to the required focus areas listed above, the California Volunteers' RFA for the current service year prioritized programs that include these components:

- a. Organizations leading service in communities with concentrated poverty, rural communities, tribal communities, and those organizations serving historically underrepresented and underserved individuals, including but not limited to communities of color, immigrants and refugees, people with disabilities, people who identify as part of the LGBTQIA+ community, people with arrest and/or conviction records, and religious minorities.
- b. Climate action and environmental stewardship, including supporting communities to become more resilient through measures that reduce

greenhouse gas emissions, conserve land and water, increase renewable energy use and improve at-risk ecosystems, especially in underserved households and communities.

- c. Programs that provide additional benefits to AmeriCorps members aimed at enhancing member experience and bolstering member recruitment and retention such as paying more than the minimum living allowance, transportation, housing, and food expenses.
- d. Programs that create workforce pathways for AmeriCorps members, including deliberate training, certifications, and hiring preferences or support.
- e. Evidence-based interventions that are assessed as having Moderate or Strong evidence on the AmeriCorps Evidence Exchange.
- f. Programs that support civic bridgebuilding programs and projects to reduce polarization and community divisions; and providing training in civic bridgebuilding skills and techniques to AmeriCorps members.
- g. Programs focused on improving educational outcomes for economically disadvantaged children, including improved school readiness; improved educational and behavioral outcomes of students in low-achieving elementary, middle, and high schools; and/or increasing readiness and access for post-secondary education and career opportunities; and those that prepare AmeriCorps members to enter teaching careers.

9. All applicants to California Volunteers RFA must also meet the requirements of the AmeriCorps notice of funding opportunity, including matching funds.

10. After California Volunteers scores and selects its sub-applications, it submits its own application to AmeriCorps for competitive ASN grants on or around January. AmeriCorps makes its own selection among sub-applications and direct applications on a nationwide basis on or around mid-April. California Volunteers then selects additional projects to submit to AmeriCorps as part of the state's formula-based ASN award. As the largest state, California receives the largest population-based formula award.

11. Under the FY 2024 AmeriCorps State and National grant, California Volunteers was awarded \$66,301,382 to carry out 91 programs supporting 6,902 corps members at 1,875 locations during the 2024-2025 service year. Under this grant, AmeriCorps allocated an additional \$25,891,952 in Segal Educational Award funds held by the National Service Trust, to be made available for AmeriCorps participants who successfully complete the minimum required hours for their term of service.

(b) #CaliforniansForAll College Corps

12. One of largest California Volunteers programs supported by AmeriCorps is the College Corps program. College Corps is a unique initiative launched in partnership with California colleges and universities. Student volunteers are provided with assistance for tuition and living expenses to help them graduate with smaller debt burdens, while serving at least 450 hours per year at community-based organizations. Programs focus on three priority areas: K-12 education, climate action and food insecurity.

13. College Corps is funded by a combination of state funds, college and private funds, and Segal education awards made available to corps members by AmeriCorps. To give corps members access to the education awards that Congress appropriated to the National

Service Trust, California Volunteers submits no-cost, education-only subgrant applications as part of its AmeriCorps State and National formula grant.

14. Of the AmeriCorps participants approved under the FY 2024 ASN grant, 2,933 are members of College Corps.

(c) AmeriCorps Support for Other Service Programs in California

15. In addition to programs administered by California Volunteers, AmeriCorps directly administers extensive volunteer programs in California, including the National Civilian Community Corps (NCCC), Volunteers in Service to America (VISTA), AmeriCorps State and National “national direct” grants, and AmeriCorps Seniors. Grantees include local governments, Indian tribes, and non-profit organizations across the state. In fiscal year 2024, AmeriCorps funded 254 additional service projects in California through these programs, covering 12,173 participants at 1,352 locations. AmeriCorps members participating under these programs provide incalculable services to California communities, from education to environmental stewardship, disaster relief to tax preparation. Recently, this included the deployment of 36 AmeriCorps NCCC members to support mass care response, Disaster Recovery Centers, and assist survivors of the 2025 California wildfires through registration, case management, case inquiries and updates, and door-to-door canvassing.

(d) AmeriCorps State Commission Funding to Support California Volunteers

16. AmeriCorps also provides grants that directly support operations and planning by state commissions.

17. For 2024-2025, California Volunteers received a Commission Investment Grant of \$1,075,783 to support the operation of California Volunteers in implementing its duties as required by the National and Community Service Act of 1990 (NCSA), as amended (42 U.S.C. §

12638). California Volunteers also received a Commission Support Fund grant of \$849,548 to support training and technical assistance for subgrantees.

(e) Total AmeriCorps Funding for Volunteer Service in California

18. Combining support for California Volunteers programs, grants to other service programs in California, and other investments, AmeriCorps total support for volunteer service in California is substantial.

19. AmeriCorps informs us that, for the 2023-2024 service year, the AmeriCorps sponsored over 18,000 corps members meeting local needs and strengthen neighborhoods in California, working at more than 2,500 locations. AmeriCorps provided over \$100 million in grants and \$32 million in educational awards.

II. Impact on California of AmeriCorps' Program Closures and Grant

Terminations

(a) Scope of Programs Affected

20. On Friday, April 25, 2025, I received an e-mail at 3:51 PM from Jennifer Bastress Tahmasebi, AmeriCorps's Interim Agency Head. The message stated:

Effective immediately, the AmeriCorps award subrecipient(s) included in the attached spreadsheet is/are being terminated per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.

... AmeriCorps staff will initiate an amendment to change the end date of the period of performance effective immediately.

Please immediately notify subrecipients and/or community partners, if applicable, and initiate your internal termination and closeout procedures.

... State commissions and prime grantees should immediately notify subgrantees, operating sites, and members and follow grant close-out procedures. All member activities should cease immediately. Members should be exited for compelling personal circumstances (CPC). The

program should document that the member was exited for compelling personal circumstances due to the agency's termination of the grant and program closure.

21. Attached to the e-mail is a spreadsheet listing 87 subrecipient programs under California Volunteers' AmeriCorps State and National award for the current service year, which was scheduled to run until December 2025. The spreadsheet includes *all* of California Volunteers' AmeriCorps programs, with the exception of two formula planning grants and one competitive operating grant that are the subject of a court order in another federal lawsuit.

22. According to the e-mail, costs after April 25 would only be paid if they were previously incurred *and* those costs were necessary for activities related to termination or closeout activities. We are required to close out all grants within 120 days.

23. In other words, as I understand it, as of Friday, April 25, AmeriCorps will no longer pay any costs incurred relating to the actual services for which our subgrantees were awarded approved grants. It will allow no exceptions or appeals, and our subgrantees can only obtain any of these funds through the intervention of this court.

24. The AmeriCorps programs that were terminated include 37 programs at state agencies and colleges. This includes all of the College Corps programs. The programs with a "\$0" federal award are education-only programs:

Organization	Project	Initial Federal Award
JUDICIAL COUNCIL OF CALIFORNIA	California JusticeCorps	\$2,197,826
Regents of the University of California, The	GrizzlyCorps - Rural Climate Solutions	\$1,215,000
California Conservation Corps	Watershed Stewards Program: CCC	\$499,995
California Conservation Corps	CCC/AmeriCorps Backcountry Trails Program	\$499,985
California State University, Fresno Foundation	California State University, Fresno Foundation III	\$190,261

Cal State LA University Auxiliary Services Inc	Californians for All College Fellowship & San Gabriel Valley	\$0
UNIVERSITY OF CALIFORNIA IRVINE	College Corps at UCI	\$0
RIVERSIDE COMMUNITY COLLEGE DISTRICT	Riverside City College College Corps	\$0
University Corporation at Monterey Bay	CSUMB College Corps 1	\$0
California State University, Bakersfield Auxiliary For Sponsored Programs Admini	CSUB Auxiliary for Sponsored Programs Administration II	\$0
Regents of the University of California, The	College Corps at UC Berkeley	\$0
California State University, Fresno Foundation	Central Valley College Corps1	\$0
Glendale Community College District	Glendale Community College	\$0
San Bernardino Community College	San Bernardino Community College District	\$0
California State University, Dominguez Hills Foundation	CSU Dominguez Hills	\$0
Regents of the University of California at Riverside	The Regents of the University of California (UC Riversid III	\$0
Shasta-Tehama-Trinity Joint Community College District	Shasta-Tehama-Trinity Joint Community College District	\$0
San Jose State University Research Foundation	San Jose State University CaliforniansForAll College Fellows	\$0
University of California, Merced	College Corps at UC Merced	\$0
California State University Chico	California State University of Chico II	\$0
University Of California, Los Angeles	UCLA College Corps	\$0
University of San Diego	University of San Diego	\$0
University of California, San Diego	UC San Diego College Corps	\$0
CAL POLY CORPORATION	College Corps - Cal Poly	\$0
DESERT COMMUNITY COLLEGE DISTRICT	College of the Desert	\$0
University of California, Davis	Regents of the University of California, Davis II	\$0
California State University, Stanislaus	CaliforniansForAll College Corps, Stanislaus State	\$0
San Francisco State University	San Francisco State University- College Corps	\$0
California State University, East Bay Foundation, Inc.	California State University East Bay CCE	\$0
CAL POLY HUMBOLDT SPONSORED PROGRAMS FOUNDATION	Humboldt College Corps	\$0
University Enterprises Corporation at CSUSB	University Enterprises Corporation at CSUSB II	\$0
State Center Community College District	Fresno City College College Corps	\$0
Riverside Community College District	Norco College- College Corps	\$0
University of California, Davis	Sacramento State College Corps	\$0
Riverside Community College District	Moreno Valley College College Corps	\$0

University Enterprises, Inc.	Sacramento State College Corps - SSCC	\$0
Compton College	Compton College	\$0

25. Seven terminated programs are at local government agencies:

Napa County Office of Education	AmeriCorps VIP	\$1,800,000
Porterville Unified School District	Building Community, Changing Lives	\$1,606,500
Imperial County Office of Education	Borderlands	\$1,116,346
San Diego County Office of Education	San Diego County Superintendent of Schools	\$899,967
Kern County Superintendent of Schools	Kern Community Mentoring Fixed-Amount	\$630,000
Napa County Office of Education	Neighbor to Neighbor Operating Grant	\$540,000
City of Ontario	Ontario Promise Corps	\$368,000

26. The remaining 42 programs are at local government agencies and not-for-profit institutions:

BAY AREA COMMUNITY RESOURCES, INC.	California Climate Action Corps	\$5,250,495
CITY YEAR, INC.	City Year Los Angeles	\$5,000,000
Reading & Math, Inc.	California Reading and Math Corps	\$3,191,076
Public Health Institute	CivicSpark	\$2,970,000
Improve Your Tomorrow	IYT College Academy Planning Grant	\$2,619,124
Jumpstart for Young Children, Inc.	Jumpstart California	\$2,033,443
Reading Partners	Reading Partners California	\$2,000,000
BAY AREA COMMUNITY RESOURCES, INC.	California Emergency Response Corps	\$1,889,979
BAY AREA COMMUNITY RESOURCES, INC.	BAYAC AmeriCorps	\$1,624,998
IFOSTER N CCDA ATTAINMENT IRU	TAY Public Health AmeriCorps	\$1,253,595
CITY YEAR, INC.	City Year Sacramento II	\$1,237,500
Reading & Math, Inc.	Ampact - College Corps	\$1,225,577
Child Abuse Prevention Council of Sacramento	CA Foster Youth Initiative	\$1,162,500
IFOSTER N CCDA ATTAINMENT IRU	iFoster	\$1,100,555
Child Abuse Prevention Council of Sacramento	Birth and Beyond	\$1,085,811
BAY AREA COMMUNITY RESOURCES, INC.	Sustainability Service Corps	\$1,071,529
NOTRE DAME MISSION VOLUNTEER CORPORATION	Notre Dame Mission Volunteers, Inc.	\$877,018
Impact Justice	California Justice Leaders - Fixed Amount	\$827,500
Strategic Energy Innovations	CCEO	\$799,983

GRID Alternatives	GRID Alternatives California SolarCorps	\$756,001
community Partners	Changeist	\$714,419
Napa County Office of Education	CalSERVES Expanded Learning (EXL)	\$713,000
Sierra Nevada Alliance	Sierra Nevada AmeriCorps Partnership	\$700,077
NORTHERN SANTA BARBARA COUNTY UNITED WAY, INC.	Northern Santa Barbara County United Way	\$675,000
Prevent Child Abuse - California	Prevent Abuse Through Home Visitation (PATH)	\$650,000
Our City Forest	Our City Forest Program AmeriCorps	\$649,980
Giants Community Fund	Giants Community Fund	\$603,692
Envisioneers Inc	Envisioneers Inc ELT	\$594,000
United Way of Monterey County	Monterey County Preschool Service Corps	\$540,000
Community Clinic Association of Los Angeles County	CCALAC AmeriCorps Health Fellows	\$538,794
American National Red Cross, The	CA AmeriCorps Disaster Team - American National Red Cross	\$538,222
Prevent Child Abuse - California	Pre-K & Beyond Learning Corps (PBLC)	\$517,500
Up2Us, Inc	Up2Us Sports AmeriCorps Coach Program, California	\$514,250
Breakthrough Silicon Valley	Breakthrough Silicon Valley	\$490,100
Shasta County Child Abuse Prevention Coordinating Council	North State Rural AmeriCorps Hope Project	\$479,315
Interval House	Interval House - Housing Opportunity & Access Program	\$476,280
916 Ink	916 Ink AmeriCorps	\$463,853
Safe Passages	Elev8 Youth Program	\$450,844
Youth Action Project, Incorporated	YOUTH ACTION PROJECT, INCORPORATED	\$405,000
LifeLong Medical Care	LifeLong AmeriCorps Health Fellows	\$250,000
University of Pacific	Pacific College Corps	\$0
Concordia University Irvine	Concordia University Irvine College Corps Fellowship	\$0
CivicWell	CivicSpark	\$0

27. The immediate termination of these grants requires California Volunteers to exit 5,656 corps members from AmeriCorps enrollment. These members will no longer receive living allowances, loan forbearance, or even health insurance provided under federal grant funding. Those members counting on Segal education awards have their eligibility period terminated as of

April 25. Many members will be facing housing, food, health, and other financial emergencies as a result of losing their living stipends, which are likely their only source of income.

28. AmeriCorps grants also supported approximately 800 program staff members who directed and managed the AmeriCorps members. These individuals are likely to lose their employment as a result of the terminations.

29. The Termination Notice provided to California Volunteers listed only programs that were subrecipients of California Volunteers' AmeriCorps State and National grant. It does not include additional AmeriCorps programs in California that were awarded directly by AmeriCorps, such as ASN "national direct" grants, VISTA, and AmeriCorps Seniors. I am aware of some such programs that have been terminated, but I do not know how many or if any survive.

(b) Impact of Program Closures

30. Following the instructions in the Termination Notice, I notified all subgrantees that AmeriCorps has directed that all award activities immediately cease. Based on the notice, most programs have had to pause member service activities to see what happens with this litigation, while others have no option but to exit members immediately and let go of staff.

31. Although it has only been approximately one week, we are already hearing from our partners about the impact:

- a. CivicSpark, a program of the Public Health Institute, had been deploying more than 100 AmeriCorps members to approximately 90 local government and community organizations to build capacity and resilience in areas such as water resource management, affordable housing, mobility, and climate change. Since receiving the termination notice, CivicSpark

has had to place these members on administrative leave and suspend their health insurance, and three members have resigned.

- b. Jumpstart for Young Children, which was delivering evidence-based early education services to over 1,500 preschool-aged children in seven rural and urban counties, will be exiting 455 AmeriCorps members and laying off program staff.
- c. Eighty new members arrived from across the country for orientation at Backcountry Trails on April 28, only to be told that they were being immediately exited from AmeriCorps.

32. I have been informed that Governor's Office is currently assessing cutting a homelessness initiative in order to redirect funds to support Climate Action Corps and College Corps members for the next few months. However, California Volunteers does not have funding to replace AmeriCorps' support to all of our 87 subrecipients during this litigation. Unless these grants are restored soon, I expect many more projects will start to shut down permanently.

33. These programs were selected by California Volunteers because they were the most effective at meeting unmet needs in our highest priority focus areas.

34. The closure of these programs will leave a gap in vital services that the state and other providers will struggle to fill in order to meet demands in areas such as education, foster care, and disaster relief. Here are a few examples:

- a. The Imperial County Office of Education, in a very rural part of the state, had approximately 40 AmeriCorps members in its Borderlands project providing daily tutoring in reading and English language to more than 200 low-achieving K-12 students, tutoring in communication and functional

academics to approximately 90 special education students, and mentoring to approximately 15 K-12 children of prisoners. This program has received funding from AmeriCorps for 27 years, in full compliance with AmeriCorps requirements, and has measured success in a randomized controlled trial showing significant improvement of student performance. Because AmeriCorps has closed this program, the County will need to quickly design and implement an alternate program to provide educational services, including Individualized Education Program (IEP) services mandated for special education students.

- b. California Reading and Math Corps trained and deployed approximately 198 members to provide evidence-based literacy and math interventions to students to over 100 rural and struggling schools to help ensure students are ready for Kindergarten, on track to read fluently by the end of third grade, and proficient in math by eighth grade. Hundreds of other AmeriCorps members provided similar services through other California Volunteers programs. In the absence of these effective K-12 programs, these vulnerable schools could see declining performance.
- c. The American National Red Cross, Los Angeles Region hosted approximately 23 AmeriCorps members who were engaged in disaster relief and disaster preparedness efforts in vulnerable communities across the state, including Los Angeles, which was only recently devastated by the Palisades Fire. These corps members leveraged hundreds more volunteers. The California Emergency Response Corps (CERC), which is

hosted by Bay Area Community Resources, a non-profit organization, had approximately 70 AmeriCorps members working on improving emergency preparedness in vulnerable communities and deploying to statewide disasters throughout the year to assist with emergency response. The loss of these programs will make it even harder to meet the enormous need in communities facing disaster.

(c) Administrative Harms to California Volunteers

35. The sudden termination of 96.7 % of California Volunteers' subgrant awards places significant burden on California Volunteers staff to verify all 5,656 AmeriCorps members enrolled have been exited appropriately from the program. This procedure, which is generally staggered based on each project's end date, must be completed for all 88 terminated subgrants within the same 120-day period. The process of exiting a member includes multiple steps at the subgrantee level, including certification of member eligibility to receive an education award, service hour completion verification, proper completion and storage of required member records, compelling personal circumstance documentation, and completion of the AmeriCorps member exit process in eGrants. Once each subgrantee submits their member exit certification, California Volunteers staff must verify that all components have been properly completed in accordance with California Volunteers and AmeriCorps requirements.

36. In addition to the member exit process, closing out AmeriCorps grants requires CV to complete all necessary financial, program, and administrative actions required under the grant. This procedure includes submitting the Federal Financial Report which requires reconciliation of all subgrant FFRs within each of California Volunteers' five prime awards,

returning unexpended funds drawn from PMS, equipment inventory, and closeout certification of each subgrantee.

III. Impact on California of the Elimination of AmeriCorps Staff

37. Even before the mass program closures, California was impacted by AmeriCorps' elimination of the vast majority of its own staff.

38. On or around April 17, 2025, I learned from America's Service Commissions (the nonprofit organization that collectively represents the 52 governor-led state and territorial service commissions) that 85% of AmeriCorps staff were placed on administrative leave. The staff that were removed from their daily duties by defendants' actions include *all* regional staff with which California Volunteers interact daily as part of its mission. They also include portfolio managers and other staff who provided training, oversight, and technical assistance to the California Volunteers staff. The federal staff played an integral role in grant management, performance oversight, and financial administration.

39. California Volunteers relies on AmeriCorps staff to ensure that its AmeriCorps-supported volunteer programs are provided training and technical assistance in managing AmeriCorps federal grant funding. Specifically, both at the regional office in Los Angeles and the national office in Washington, D.C. California Volunteers works with AmeriCorps' regional office on day-to-day member issues such as member verification, educational grants, problems accessing the e-grants portal. Those AmeriCorps staff also help subgrantees interpret rules and regulations, respond to member inquiries on myriad subjects, resolve member grievances, and support the public in accessing the various AmeriCorps programs that are available, processing programmatic and budgetary change requests that require AmeriCorps agency approval.

40. Since April 17, AmeriCorps staff that our office formerly worked with on a day-to-day basis have gone silent, halting regular meetings and leaving our messages unanswered.

This includes:

- a. Staff in the region office, who we rely on to resolve enrollment issues, member complaints, and record correction, among other tasks.
- b. Staff in the national office, who have abruptly curtailed regular meetings and coordination around recruitment, branding, and communications strategy for the coming cycle, as well as the ongoing development of the new grants management technology system scheduled to be rolled out in the coming year.

41. Our office is especially concerned about the drastic dismantling of AmeriCorps staff, due to the critical timeline for AmeriCorps grants in the next two months.

42. For the upcoming fiscal year cycle, we closed our own competitive grant application process, and submitted our statewide application for competitive ASN awards on or about January 23, 2025. The Notice of Funding Opportunity stated that AmeriCorps would issue awards by mid-April; however, we have yet to receive a response. Even before staff was put on leave, we were aware that AmeriCorps was behind schedule, due to its focus on new certification and compliance rules relating to certain executive orders issued by President Trump in January and February, which required grant amendments and a myriad of other communications. Without full staffing, ASN awards will certainly be delayed significantly longer, to the extent that any awards will actually be made for the upcoming fiscal year.

43. The AmeriCorps State and National grant alone involves thousands of sub-applications designed by different non-profit organizations and packaged into the various state

applications or submitted directly to the national office. AmeriCorps needs to review and score each sub-application while also performing financial and legal checks on the host organizations. Throughout this process, AmeriCorps staff work interactively with states and direct applicants to clarify issues and resolve application problems. I cannot imagine how this process can be completed accurately or on time after the elimination of 85% of the experienced staff assigned to the task.

44. The delay in ASN awards has a cascading effect. We can only prepare and submit our formula-based application once we know which projects were selected for competitive funding, if any. In a normal year, we need to submit our formula application by the June 13, 2025, deadline in order to have it processed and approved. Most of our AmeriCorps projects are based in K-12 schools and colleges, and we need fully executed awards by mid-August so that we can legally start enrolling members before the academic year begins. If the competitive ASN grant awards are delayed much longer, this will delay our formula grants as well, putting at risk all school-based projects, including College Corps. It also can result in the loss of service site partners, and as a result, the loss of privately-provided match funding, reducing the overall number of AmeriCorps service positions that subgrantees can support and services that are available to vulnerable communities and students.

45. At the same time, there are many other grants processed by AmeriCorps remaining staff. This includes funding for California Volunteers itself. On or around April 1, 2025, California Volunteers submitted its applications for a Commission Support Grant (\$897,284) and a Commission Investment Fund grant (\$244,911). Commissions like California Volunteers carefully budget their operations based on these formula grants, which are supposed to be effective July 1, 2025. As of now, we do not know whether these funds will issue at all, but

they certainly cannot be meaningfully awarded or processed if AmeriCorps staff are not present to do so.

46. California Volunteers also has a time-sensitive pending grant amendment request that was submitted on or around March 28, 2025. Due to our internal reorganization last year, we requested that approximately \$1.9 million in FY 2024 commission grants be reassigned from the Office of Planning and Research to GO-Serve. The ongoing delay in processing this administrative amendment is preventing California Volunteers from accessing these previously awarded funds, and there is a risk that we will not be able to use them within the budget period.

47. While processing these grants that directly impact California Volunteers, AmeriCorps' remaining staff must also process grants for other programs that California Volunteers does not administer, compounding the impossible workload.

48. In addition to grantmaking, California Volunteers also relies on AmeriCorps staff to be able to wind down current projects. Our current fiscal year cycle is approximately three-quarters done, but in the coming months we would typically need AmeriCorps staff involvement for exiting volunteers, closing out projects, performance reports, and financial reporting. This is even more urgent given the immediate wind-down of projects AmeriCorps has since demanded, as discussed further below.

IV. Additional Harms to California Caused by the Effort to Dismantle AmeriCorps

49. The immediately felt impact of the efforts to dismantle AmeriCorps has significantly damaged California Volunteers' ability to support viable programs for the coming service year.

50. Current year recruitment and recruitment for 2025-2026 have come to a halt due to funding uncertainty.

51. Several programs that are key subapplicants in California Volunteers FY 2025 application have indicated that they are not going to be able to proceed under the current environment. These include the Partnership for Veterans and People Experiencing Homelessness; Prevent Abuse Through Home Visitation; Changeist; and the California Foster Youth Initiative.

52. The sudden nature of the effort to dismantle AmeriCorps—with zero advance notice before drastic changes has deprived California Volunteers of the opportunity to advocate for the importance of these programs, in particular through notice and comment rulemaking.

53. Notice and the opportunity to comment would have been especially important here, where the ultimate decision-makers have shown no awareness whatsoever of the work supported by AmeriCorps, the extraordinarily broad reach of programs in terms of communities and stakeholders, or the multiplying effect that AmeriCorps investment has in terms of matching program funds and measurable outcomes.

54. For example, if we had notice and the opportunity to comment, California Volunteers would be able to inform AmeriCorps that, in our estimation, these cuts would reduce support to over 70,000 California students in their efforts to stay on track to graduate through tutoring and mentoring, reduce opportunities for nearly 40,000 low-income individuals at Self-Help Legal Centers in up to 24 different languages, reduce disaster services for 33,000 individuals, reduce education and employment support for 17,000 foster youth, and reduce support services for nearly 4,000 unhoused individuals.

V. Conclusion

55. AmeriCorps's staffing reductions and grant terminations have already severely impacted California Volunteers. AmeriCorps-supported programs remain in jeopardy due to the

unavoidable delays caused by the loss of experienced staff, and our facilitation of AmeriCorps' demand to terminate existing projects. California Volunteers cannot maintain these vital, impactful service programs without AmeriCorps' continued cooperation and funding. The essential work that California Volunteers does across California simply cannot continue in any meaningful way if AmeriCorps' symbiotic role is eliminated virtually in its entirety, while simultaneously demanding that virtually all of the vital work funded by it, and approved by Congress, come to an immediate halt.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Sacramento, California.


/s/ *

Ia Moua
Director of State and National Service
California Volunteers

*A copy of the signature page bearing an original signature is attached hereto.

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